

EXHIBIT 35

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 - - -

5 IN RE: NATIONAL :
PRESCRIPTION : MDL No. 2804
6 OPIATE LITIGATION :
_____ : Case No.
7 : 1:17-MD-2804

THIS DOCUMENT RELATES :
8 TO ALL CASES : Hon. Dan A. Polster

9 - - -

10 Tuesday, January 22, 2019
11 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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13
14 Videotaped deposition of CHRISTOPHER J. FORST,
15 held at the offices of Baker & Hostetler,
16 200 South Civic Drive, Columbus, Ohio 43215,
17 commencing at 9:14 a.m., on the above date, before
18 Carol A. Kirk, Registered Merit Reporter and Notary
19 Public.

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22
23 GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
24 deps@golkow.com

1 A. Yes.

2 MS. WICHT: Thank you.

3 Q. And what type of information did
4 you have?

5 A. It was -- ranged from very little
6 to maybe their -- their dispensing information.
7 There were some that we possibly had a list of
8 doctors that we had compiled from somewhere that
9 they were possibly filling prescriptions for and
10 that could have been a source from them, or just
11 notices that we -- in the area from newspaper
12 notices of questionable physicians.

13 Again, I couldn't look at the
14 prescriptions. That's a HIPAA violation for me
15 because I'm not in any part of that. So I would
16 have to ask the pharmacist questions about --
17 and go through the ten things: Do you do your
18 due diligence? Are you familiar with your
19 physician's practice? Do you know what his
20 specialty is? Do you know of any legal action
21 that may or may not have been taken against him
22 with controlled substances?

23 So there was that list. And it
24 was very similar to what the investigators used.